DOCUMENT RESUME

ED 134 088 HE 008 564

TITLE Report of the Interagency Task Force on Higher Education Burden Reduction.
INSTITUTION Department of Health , Education, and Welfare, Washington., D.C. Office of the Secretary.
PUB DATE 14 Dec 76
NOTE 22p.

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS *Accountability; *Data Collection; *Federal Aid; Federal Government; Federal Programs; Feedback; Financial Policy; Government Role; *Higher Education; Information Needs; *Information Systems; Policy; *Recordkeeping; Records (Forms)
IDENTIFIERS *Reporting Reduction

ABSTRACT

The growth of categorical federal aid to universities and colleges has brought with it wave after wave of regulations, surveys, and compliance activities. In the last few years there has been an awareness that unless a wider perspective can replace the motivations of the individual federal agencies who define accountability and data needs, the relationship between institutions and the government will be damaged. The Interagency Task Force on Higher Education Reporting Reduction makes 19 recommendations for streamlining procedures and policies affecting information gathering by federal agencies. (Editor/MSE)

****
* Documents acquired by ERIC include many informal unpublished *
* materials not available from other sources. ERIC makes every effort *
* to obtain the best copy available. Nevertheless, items of marginal *
* reproducibility are often encountered and this affects the quality *
* of the microfiche and hardcopy reproductions ERIC makes available *
* via the ERIC Document Reproduction Service (EDRS). EDRS is not *
* responsible for the quality of the original document. Reproductions *
* supplied by EDRS are the best that can be made from the original. *
****

ED134088

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

OFFICE OF THE SECRETARY

WASHINGTON, D.C. 20201

January 26, 1977

HE

Enclosed you will find the final report of the Interagency Task Force on Higher Education Reporting Reduction. The report is the result of one month of intensive concentration on the problem of Federal reporting and recordkeeping burdens expressed well by many spokesmen for colleges and universities.

The objective of the Task Force was to identify those steps which might alleviate some of the major strains between the institutions and the Government. No attempt was made to reconstruct the entire regulatory and data reporting mechanism of the Federal Government; rather, recommendations were made to improve the present approaches and involve institutional thinking early in the development of such requirements.

This report is only a start. It will be the responsibility of Federal agencies and the institutions themselves to keep attention focused on the unnecessary burdens that have been increasing in recent years. Some particular steps that you and others at your organization might take are as follows:

1. Call this report and the problem to the attention of the Congress:

   a. Your State's Senators and Congressmen

   b. Key Congressional committees, such as:

      1) Subcommittee on Education of the Senate Committee on Labor & Public Welfare

      2) Subcommittee on Postsecondary Education of the House Committee on Education & Labor

      3) House Committee on Government Operations

      4) Senate Committee on Government Operations

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION
THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

HE008 524

5) Subcommittee on Census and Population of House Committee on Post Office and Civil Service

6) Subcommittee on Census and Statistics of the Senate Committee on Post Office and Civil Service

c. Staff members of the above committees

2. Bring these recommendations to the attention of Federal agency personnel -- agency heads as well as operating staffs -- when reporting requirements, regulation or recordkeeping obligation is onerous or unjustified, or when this report's recommendations appear to have been overlooked.

3. Contact the new administration to alert them to this report, in particular, the new Secretary of Health, Education, and Welfare and the President elect.

There are two major dimensions of discussions I've had with higher education organizations: (1) there is a great need for specificity to accompany the rhetoric on this problem of reporting and recordkeeping burden, and (2) institutions and associations must be prepared to provide outreach and actual assistance.

In the latter case, for example, Recommendation No. 4 would place knowledgeable institutional spokesman in a position to advise in the forms planning process, but who will they be? Will they react promptly? Will they be able to "speak as one voice?" regarding the feasibility, justification, and appropriateness of proposed surveys and reporting forms? Will they respond to the new "paperwork provisions" of the Educational Amendment of 1976?

In another case, Recommendation No. 5 asks for the agencies to obtain from a sample of institutions measures of the workload associated with responding to selected forms and surveys. Will zealous campus respondents exaggerate these measures as much as the agencies now understate them? Will this key component of the consciousness - raising be treated as just another burden or recognized as the chance it provides to participate in demonstrating the real burdens imposed by the agencies?

Recommendation No. 7 asks for on-site, in-depth pretesting. Will the selected institutions want to invest this effort on behalf of the higher education community?

Would institutions dismantle the current complex certifying committees in an area such as the human subjects portion of Recommendation No. 16? Is there too great a vested interest in faculty leadership rewards and power in the committees now in place?

We are all involved in this problem -- the agencies, the institutions and the associations. Presently, the power resides almost entirely in the agencies, while the general stance at the campus is supplication for Federal funds. It seems to me that associations such as yours will play the most significant role in any amelioration of the trends we suffer. I appreciate your interest in this difficult problem and welcome your support of these recommendations or other suggestions for improvements in the reporting, recordkeeping and regulatory relationship between the Federal Government and higher education institutions.

Sincerely yours,

Robert Wright

Robert Wright
Chairman
Interagency Task Force
on Higher Education
Reporting Burden

Enclosure

REPORT OF THE

INTERAGENCY TASK FORCE ON

HIGHER EDUCATION BURDEN REDUCTION

December 14, 1976

INTRODUCTION

The Federal Government and colleges and universities have in recent decades entered into a remarkable partnership, building the world's greatest capability for scholarship, advanced education and the application of fundamental knowledge to the pressing problems of our society. The Government played a leading role in recognizing the unique resources represented in our higher education institutions, but has turned in the last 20 years toward offering support for those programs and incentives which further national objectives directly. This growth of categorical aid to universities and colleges has brought with it the expected controls born of the need for stewardship in the use of these Federal monies. Many institutions are critically dependent on this Federal support. As wave after wave of regulations, surveys, and compliance activities have hit, they have until recently endured with suffering and silence, while resources made scarce by shrinking dollars have been diverted to administrative and accountability functions.

In the last few years, however, there has been a rising level of consciousness, an awareness by the institutions that unless a wider perspective can replace the individualistic motivations of those in Federal agencies who, by themselves, define the need for data and detailed accountability, this special partnership between Government and the institutions will be maimed. It is even now severely strained.

In his opening remarks to this Interagency Task Force on Higher Education Burden Reduction, Dr. Mathews, Secretary of Health, Education, and Welfare, said:

> "The strength behind that protest is considerable, determined and permanent. It is an idea whose time has come.
>
> At this point, you have control of how the needed changes will come about. They can come about with some deliberation on the part of people who are invested with the responsibility or they can come about more precipitously with less thought. I am fully convinced that it is in your interest and the interest of your agencies to make some accommodation to the petition of the institutions of higher learning and post-secondary education in this country. I think it serves your purpose and their purposes as well."

The Interagency Task Force brought together, under White House initiative, 28 people from 15 agencies to: assess the problem; evaluate a set of recommendations[1] made by a group of college and university experts on Federal paperwork and reporting burdens; and propose specific steps which would have the greatest effect on the reporting and recordkeeping burdens of the institutions.

1/ Report of the Secretary's Work Group for Consolidation and Simplification of Federal Reporting Requirements for Institutions of Higher Education, HEW, October 15, 1976.

The charge was to have an impact, and promptly. This established the scope for the work of the Task Force. The resultant recommendations below concentrate on relatively immediate steps which would considerably lessen the tensions between academia and the Government and relieve much of the workload that falls on the institutions and Government alike.

1. At present there is no single directory or index to Federal data gathering programs affecting higher education institutions which can be used by the agencies or the various forms clearance offices to identify sources of data, technical survey design expertise, or duplication. The Task Force recommends that the Statistical Policy Division, Office of Management and Budget, should develop such an index, with entries made at the earliest notice from the agencies of plans to collect data and updated as each form is revised or new forms added. This fully-developed capability might involve a computerized information system which could be tapped by remote terminal permitting a search by topic, by data element, and by agency. Periodically it would be possible to produce from this data base a directory of forms being used with higher education institutions, making available a data source reference for use by those seeking data about higher education institutions.

2. The Task Force believes that the data acquisition plan of the Education Division of HEW is an important tool for planning and evaluating information needs and resources. This plan identifies the data gathering activities to be undertaken in the following fiscal year. Those which are approved are the only data acquisition activities which can be mounted that year. The Task Force recommends that all Federal agencies develop data acquisition plans.

3. The Task Force does not find that control of the paperwork dilemma can be gained simply by demanding that agencies meet even more stringent and detailed documentation requirements for the approval of forms than now exist. Many forms designed to collect survey data and to satisfy administrative recordkeeping requirements are well designed, and reflect excellent conceptual, technical, and consultative efforts. Requiring in all cases that forms clearance be subject to extensive clearance documentation discourages the responsible approaches to information collection which should be encouraged. Increased internal paperwork within government can be as needlessly burdensome as it is at colleges and universities.

The Task Force therefore recommends that OMB revise its forms clearance procedures by requiring a notice to OMB of the intention to originate or renew a form. OMB would then assign the form to one of two clearance tracks, using stratified random sampling method. However, controversial or particularly burdensome forms could be assigned to the second track with certainty. The smaller set of forms in the "audit" track would require the full and extensive package of documentation called for in the current OMB instructions for Form 83 and elsewhere in the Task Force report. Intensive OMB review of forms clearance packages in the second track on the described sample basis should provide sufficient basis for an assessment of the agency's capacity to produce optimal information gathering instruments and complete justifications.

In subsequent cycles, agencies with demonstrated success in previous audits should continue to have their work examined on the modified random basis described above. Failure to satisfy the justification and documentation requirements of the Federal Reports Act and related regulations and OMB circulars shall be taken as prima facie evidence of an agency or division's inability to control unnecessary, uneconomical, ineffective, or burdensome reporting requirements. OMB would then audit in succeeding years a much larger portion of clearance packages only from those offices which fail the initial audit.

4. The Task Force recommends that higher education institutions and their representative organizations should serve as experts on the design, feasibility, necessity, and appropriateness of statistical surveys of such institutions. This consultation should be sought by survey sponsors early in the planning process, before data formats and definitions are nearly finalized. Although such consultation would be also available to the Clearance Offices of OMB and GAO, its greater value will be in the development and evaluation phases of survey planning by the agencies.

5. Although there are three basic measures used by OMB to measure Federal reporting requirements (number of reporting forms, number of respondents, and amount of time required to

complete the reports), identifying the level of burden requires the accurate estimation of all three measures. The Task Force review of selected clearance packages and analysis of reporting procedures showed that amount of time required is unlikely to be known accurately by the agencies or OMB.

Most forms require for their completion the cooperation of many offices at colleges and universities, and the number of respondents is a variable multiple of the number of institutions filing the report. The understatement of number of respondents would not itself be a serious problem if the number of person-hours required to complete the forms were actually known. The usual agency practice of estimating average person-hours in almost every case ignores the range of effort across institutions and the fact that the burden is knowable and need not be guessed at by agencies in Washington.

The Task Force recommends that for all forms a sample of respondent institutions be asked to report estimates of marginal person-hours that are necessary to complete the form. This estimate should be given in two categories: (1) the time required for reporting the information after it has been assembled; and (2) the time expended in collecting and assembling the information if it is not already available.

Agencies should design the samples so that good empirical estimates of the distribution of burden can be derived for institutions of different size and type of control. These estimates should be used in weighing the need for the information against its burden to the respondents.

6. Complaints of response burden are frequently to be found at the institution level but less recognized at the agency level. In order to better evaluate the burden of Federal forms, the Task Force recommends that agencies maintain comment and complaint files on a form-by-form basis and use them in forms redesign and in interpreting the data obtained.

7. The Task Force finds ample evidence that the current practices of planning surveys and pretests, and the current statutory requirement of formal clearance of all

surveys addressed to more than nine respondents, are insufficient to minimize the reporting burdens. The Task Force recommends comprehensive pretesting by the form and survey sponsors at a representative group of institutons prior to submission to OMB or GAO for final clearance to permit sponsors to identify potentially onerous aspects of their proposed instruments and generally improve the quality of data collected.

The Task Force also recommends that pretesting should be done on site at institutions so form and survey sponsors can see firsthand any special difficulties and be more able to provide instructions and instruments which will meet the criteria of efficiency, adequacy and minimum burden on respondents.

8. The collection of highly detailed information by which Federal agencies may discover the failure of institutions to comply with regulations or statutes may be inappropriate when respondent burden and practical utility to the agency are considered. The Task Force recommends that screening surveys be utilized to detect the need for the subsequent collection of more detailed data. Although this two-stage approach may appear to take more time, there will be far less respondent burden, the compliance agency will not have to handle such a large volume of unused data, and the staff can be made available for the analytic work which so often is pressed into the background.

9. The Task Force recommends that special attention should be paid by survey sponsors to the workload required for statistical and administrative reporting as it impacts on certain groups of institutions. For example, small institutions have less capability to take on what might be a modest request of a campus with more resources. The data which might be obtained from the smaller institutions or other categories of institutions may weigh very lightly in the corpus of data for decison-making, but nevertheless pose a workload, perhaps a clear example of unnecessary burden.

10. Sampling of the data items should also be used to reduce respondent burden. For example, certain data might be collected by a census of all institutions, while more detailed data could be obtained from just a sample of those institutions. This approach will still be considered a single survey by the Clearance Office, OMB, because its objective is to reduce reporting burden.

11. The Work Group Report[1] recommended that all Federal data activities be consolidated in a single agency in order to reduce the number of Government/institution contacts, standardize definitions, remove duplication, minimize changes in definitions and data formats, and disseminate the results in a timely fashion. Careful examination of the implications of this proposal has led the Task Force to recommend against a single data collection agency. In the view of the Task Force, these objectives would not be guaranteed by such an agency.

On the other hand, there are counter-indications that a single data collection agency could add problems. What is often thought by critics of Federal reporting requirements to be duplication often turns out to be not much redundancy, but a very heavy load of reporting which does not appear necessary. In many cases data serve specific program or policy purposes, and increasing the distance between user and data collector is inadvisable. No currently established agency is staffed or otherwise prepared to handle the heavy workload of such a consolidation, and increased funding of that magnitude is unlikely. Agencies which become dependent on another agency for their data will become vulnerable when exposed to data policies or changing priorities which they cannot control. The complexity of such a new organization would not lead to simplification of the contacts between Government and the institutions. The single agency could not be expected to be able to provide the substantive expertise in the depth now available in specialized agencies.

Many of the recommendations of the Task Force, if implemented, can be expected to cut back on unnecessary or poorly designed data collection efforts. Instead of supporting the single agency concept, the Task Force recommends enhanced support for the continued improvement of statistical agencies and units, such as the survey, data library and dissemination services at the National Center for Education Statistics (NCES).

The Task Force also recommends that survey data from non-federal organizations should be added to the EDSTAT system at NCES to broaden the base of statistical information.

1/ ibid

12. The Task Force recommends that data elements which have multi-agency uses be identified early in the planning process and that priority be given to the early editing and release of responses to these items. The Task Force also urges agencies to utilize partially pre-filled forms, drawing from data already in Federal agency files.

13. The Federal Administrative Procedure Act establishes a process for ensuring that public reaction to Federal policies is considered during the development of regulations. The several steps in this process include publication of a Notice of Proposed Rule Making (NPRM) with a 45-day comment period prior to publication of final regulation; encouraging comments through public hearings; requiring that Federal agencies maintain a record of written comments received during the NPRM comment period for review by interested persons; and, publication of final regulations reflecting public opinions and suggestions for change.

    A quick survey of thirteen of the agencies represented on the Task Force indicates that public involvement is an increasingly important factor in the regulations process, and that the agencies should reflect this in a more systematic way. The Task Force recommends that Federal agencies should, where appropriate, introduce into the current regulations development process a "notice of intent to develop regulations" to be published in the Federal Register with an allowed comment period of 45 days prior to the NPRM stage. The current Notice of Proposed Rule-Making process should, where appropriate, detail the type of reporting forms that will be required by the new set of regulation and estimate the burden institutions will have to assume in collecting or maintaining data. The agency should indicate its willingness to evaluate within two years the impact of the regulation in major policy areas.

14. Accountability for Federal Funds is necessary; however, OMB should reduce the institutional recordkeeping requirements entailed in Federal time and effort reporting and documentation of cost sharing by ensuring that collected information is meaningful and useful. OMB should implement the Commission on Government Procurement recommendation (B-8) which would effectively eliminate the necessity for cost sharing on R&D projects in concurrence with a similar recommendation endorsed by the Federal Paperwork Commission at its meeting on December 3, 1976. OMB should also seek omission of cost sharing requirements in the Independent Offices-HUD and HEW-Labor Appropriations Acts.

15. The Task Force recognizes the accomplishments inherent in OMB Circular A-110, which establishes uniform administrative requirements for grants and other awards received from Federal agencies. This Circular is expected to contribute appreciably to the reduction of the recordkeeping and reporting burden on colleges and universities on all grants and on those contracts, though few in number, to which it applies.

The Task Force believes that this contribution could be considerably enhanced if the standards set forth in OMB Circular A-110 could apply, in some measure at least, to the majority of contracts for research, training, demonstration, and public service that are generally performed in colleges and universities. There would undoubtedly have to be some flexibility in order to conform to the major procurement regulations, but Circular A-110 represents a significant achievement that should be extended where possible to contracts.

OMB is urged to consider such extension.

16. A single agency should be identified for managing the Federal interest in selected areas, such as human subjects protection, care and use of laboratory animals, clean air, pure water, and patents. Such an approach could be modeled after the existing cognizant audit agency concept which has reduced duplicative activities associated with financial audits of federally-sponsored programs by assigning each college and university to a single auditing agency, generally the agency with the greatest support to that institution.

The current mode of operation in such areas could be characterized as an informal version of lead agency responsibility, i.e., one agency having the broad legislative mandate in a given area, but other interested agencies are still able to regulate with no assurance that individual provisions are compatible to other existing agency guidelines. A case in point is the area of human subjects research. An institution of higher education may have to negotiate separate general assurance for the use of human subjects in research and related activities reflecting the different requirements of, for example, HEW, ERDA, and the Consumer Product Safety Commission. Under the cognizant agency concept, on the other hand, a single agency would assume complete responsibility for the development of all regulations in that area, reviewing existing regulations across Government and prepare a codification with recommendations for legislative changes as necessary to remove inconsistencies. It would minimize the reporting and recordkeeping burden by being the only agency having interface with higher education institutions in a given area.

In support of the cognizant agency concept, the President should direct all appropriate agencies to respond within 90 days to his request for agency positions in regard to the assumption of the cognizant role in the areas of: (1) human subjects protection, (2) care and use of laboratory animals, (3) clean air, (4) pure water, and (5) patents. After submission of agency positons, OMB should advise the President on the final selection of cognizant agency to each area.

17. The suggestion to consolidate the Federal Government's programs of enforcement of equal employment opportunity, civil rights and affirmative action is attractive although the problems which need to be addressed are too broad and complex to be included as a mission of this Task Force with the current time frame. For example, there is overlapping among various antidiscrimination legislative provisions, Executive Orders, and their implementing regulations designed to prevent discrimination by Government contractors, grantees and employers, public and private. These legislative provisions and Executive Orders are administered by several Federal agencies. This situation, in some instances, leads to undue burden in the form of duplication of enforcement activities which

wastes the resources of all parties and impedes effective enforcement. Civil rights enforcement and the administration of regulations have been perceived in some instances as imposing unreasonable burdens. We have examined the various civil rights regulations and instructions and have determined that there is no significant redundancy in recordkeeping and reporting requirements.

The Task Force recommends that the President form an appropriate group of knowledgeable persons from all relevant agencies and representatives from selected universities and colleges who have expertise in these areas to be convened by February 1977 to explore this complex problem under the chairmanship of a distinguished leader from the higher education community who is knowledgeable, sensitive, and experienced in the field of civil rights. Adequate staff and other support must be provided in this effort. The Presidential group should prepare within a 90-day period an action plan for this consolidation, including the legislative changes necessary to assign "cognizant agency" status (see Recommendation 16).

The Task Force also recommends that the Department of Labor, the Office of Civil Rights (HEW), the Internal Revenue Service, the U.S. Commission on Civil Rights, the Justice Department and the Equal Employment Opportunity Commission coordinate their enforcement activities through a memorandum of understanding.

18. The Federal Government permits recipients of grants and other agreements to purchase nonexpendable personal property. This property must, under OMB Circular A-110, be accounted for if the purchase price of an item is $300 or more. The property management function of the recipient institution involves considerable effort in maintenance of unit records on: the item's description; serial number; source of purchase; acquisition date; cost; location; condition; use; date this information was reported; and ultimate disposition data including sales price, method used to determine fair market value, and other characteristics. In addition to creating a record on each such item of property purchased for $300 or more, a complete physical

inventory must be taken at least biennially; a control system must be established to prevent loss, damage or theft with full investigation and documentation in the event of loss, damage or theft; and adequate maintenance procedures must be established to keep the equipment in good condition. In short, higher education institutions pay a very great additional price (i.e., burden) when they agree to purchase even rather modestly priced equipment with Federal money.

These provisions of OMB Circular A-110 are, of course, designed to assure proper stewardship of property acquired at Government expense. The question has been raised, however, as to why the $300 level has been set. An estimate by the National Association of College and University Business Officers indicates that if the accountability level were raised from $300 to $1,000, there would still be accountability under Circular A-110 for about 84 percent of the dollars represented by this nonexpendable equipment category, but the number of items to be handled as described above would drop 66 percent.

It should be noted that an item of equipment which costs less than $1,000 becomes the institution's property without reimbursement to the Government when there is no further use for it on Government projects. Circular A-110 appears to be interested in controlling the item under $1,000 by extensive recordkeeping, handling, reporting requirements only for the duration of particular projects.

The Task Force recommends that the Financial Management Branch, OMB, change its Circular A-110, Attachment N, Section 2.c. to define "nonexpendable personal property" to include that which is purchased for $1,000 or more, rather than the current $300 level. In this way, a substantial amount of property management and recordkeeping responsibility will be lifted from universities and colleges.

19. Significant amendments to the filing requirements for exempt organizations were enacted as part of the Tax Reform Act of 1969. At that time, the Internal Revenue Service agreed to accept from a variety of exempt organizations, including universities and colleges, their own substitutes for the detailed financial information required in Form 990, Part II in lieu of a completed Form 990. In 1975, IRS determined that it could no longer accept

substitutes for two reasons: (1) a significant lack of uniformity in the way financial records were maintained and reported, and (2) the development within IRS of criteria utilizing items from the Form 990 to be applied by computers in the selection of returns for audit. For the past eighteen months, the National Association of College and University Business Officers (NACUBO) and its counsel have met with the IRS in an attempt to find an acceptable compromise. The institutions believe that completion of Part II of Form 990 would require them to keep their financial records in a way that often conflicts with recognized accounting standards developed and approved for use by universities and colleges. As a direct result of these negotiations, the Internal Revenue Service has agreed to certain changes on the Form 990 for 1976 and will review instructions for completing the 1975 and 1976 forms prepared by NACUBO for dissemination to its membership.

TASK FORCE MEMBERS
(Chairman, Robert Wright)

Agency	Name	Title
Department of Agriculture	Charles W. McDougall	Deputy Administrator, Extension Service
Commission on Federal Paperwork	Howard E. Holcomb	Director, Education Study Group
Commission on Federal Paperwork	Howard Wile	Consultant
Department of Defense	Thomas W. Carr	Director, Defense Education
Equal Employment Opportunity Commission	Melvin Humphrey	Director of Research
Equal Employment Opportunity Commission	Odessa M. Shannon	Special Assistant to the Director of Research
Energy Research and Development Administration	Sidney G. Roth	Senior Program Associate for University Programs
Environmental Protection Agency	Frederick Lilly	Director, Program Reporting Division
Department of Health, Education, & Welfare	Philip Austin	Deputy Assistant Secretary for Education (Policy Development)
Department of Health, Education, & Welfare	F. William Dommel, Jr.	Program Analyst National Institutes of Health
Department of Health, Education, & Welfare	Theodore Drews	Acting Director, Division of Survey Planning & Analysis, National Center for Education Statistics
Department of Health, Education, & Welfare	John Hodgdon	Acting Deputy Assistant Director for Planning and Program Coordination, Office of Civil Rights

Department of Health, Education, & Welfare	Richard R. Sonnergren	Special Assistant to the Deputy Commissioner for Post Secondary Education, Office of Education
Department of Health, Education, & Welfare	Burton Taylor	Acting Director, Higher Education Divison, Office of Civil Rights
Department of Health, Education, & Welfare	Gooloo Wunderlich	Associate Director, Data Policy, Assistant Secretary/ Health
Department of Justice	Maurice Rosenberg	Special Assistant to the Attorney General
Department of Justice	Mary Wagner	Assistant to the Deputy Attorney Gene.
Department of Labor	Anne Blackwell	Equal Employment Specialist
Department of Labor	David Ganz	Employee Benefits Specialist, Pension & Welfare Benefits Program
Department of Labor	Ronald P. Gilbert	Wage Hour Analyst
National Aeronautics & Space Administration	W. A. Greene	Chief, Policy Coordination, Office of University Affairs
National Foundation for the Arts & Humanities	David J. Wallace	Special Assistant to the Chairman, National Endowment on the Humanities
National Science Foundation	Richard M. Berry	Study, Director, University & Nonprofit Institutions Studies

National Science Foundation	Robert Wright	Head, Science Indicators Unit
Office of Management & Budget	Roye Lowry	Chief, Clearance Office, Statistical Policy Division
Office of Management & Budget	Katherine Wallman	Statistical Policy Division
Department of Treasury	Charles W. Rumph	Special Assistant for Exempt Organization Matters Internal Revenue Service
Department of Treasury	Joseph A. Tedesco	Director, Exempt Organizations Division, Internal Revenue Service
Veterans Administration	Fred Branon	Assistant Director, Research & Biometrics, Office of Comptroller
Veterans Administration	Dennis Paradowski	Educational Consultant

Staff Support

Suzanne Medgyesi-Mitschang	Department of Health, Education & Welfare Office of Regulatory Review
Harry Travis	Department of Health, Education & Welfare Office of Planning & Evaluation
Shirley A. James	Department of Health, Education, & Welfare Office of Regulatory Review
Sarah Thomas	Department of Health, Education, & Welfare Bureau of School Systems, Office of Education